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**Proposed Liaison Counsel for Lead Plaintiff
Movant Adrian G. Mongeli and the Class**

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**Proposed Lead Counsel for Lead Plaintiff
Movant Adrian G. Mongeli and the Class**

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

I.B.I. INVESTMENTS, LTD. Individually,)
And On Behalf Of All Others Similarly)
Situating,)
Plaintiff,)
vs.)
TERAYON COMMUNICATIONS)
SYSTEMS, INC., ZAKI RAKIB, JERRY)
D. CHASE, MARK A. RICHMAN, and)
EDWARD LOPEZ,)
Defendants.)

CASE NO.: 3-06-CV-03936 MJJ

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER REGARDING SCHEDULE FOR
FILING AMENDED COMPLAINT AND
RESPONSIVE DOCUMENTS**

1 WHEREAS, on September 11, 2006, Adrian G. Mongeli moved the Court for an order
2 appointing him Lead Plaintiff in this action and approving his choice of lead counsel;

3 WHEREAS, no other member of the putative class is currently seeking appointment as Lead
4 Plaintiff, thereby making it likely that the Court will grant Mr. Mongeli's motion;

5 WHEREAS, proposed Lead Counsel have indicated that they intend to file an amended class
6 action complaint after the appointment of Lead Plaintiff;

7 WHEREAS, the parties have agreed to a reasonable extension of time for Lead Plaintiff to
8 prepare and file the amended complaint and for Defendants to respond to it;

9 NOW THEREFORE, it is hereby STIPULATED and AGREED that the following deadlines
10 are established for the filing of the indicated documents:

11 1. Lead Plaintiff's amended complaint shall be filed and served within 60 days from the
12 date of the order appointing Lead Plaintiff and Lead Counsel;

13 2. Defendants shall answer or move to dismiss the amended complaint within 60 days
14 from service of the amended complaint;

15 3. In the event Defendants move to dismiss the amended complaint, Lead Plaintiff shall
16 file his response to that motion within 45 days from service of the motion;

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4. Defendants may file a reply to Lead Plaintiff's opposition to the motion to dismiss within 30 from service of such opposition documents.

IT IS SO STIPULATED:

Dated: October 17, 2006

Michael D. Braun
BRAUN LAW GROUP, P.C.

By: /S/
Michael D. Braun
12400 Wilshire Blvd., Suite 920
Los Angeles, CA 90025

**Proposed Liaison Counsel for Lead Plaintiff
Movant Adrian G. Mongeli and the Class**

Maya Saxena
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**Proposed Lead Counsel for Lead Plaintiff
Movant Adrian G. Mongeli and the Class**

Dated: October 17, 2006

Patrick E. Gibbs
Amy Stein
LATHAM & WATKINS LLP

By: /S/
Patrick E. Gibbs, Esq.
140 Scott Drive
Menlo Park, CA 94025

**Attorneys for Terayon Communications Systems,
Inc.**

[PROPOSED] ORDER

Upon the Stipulation of the parties, and for good cause appearing, IT IS SO ORDERED.

DATED: _____, 2006

HON. MARTIN J. JENKINS
U. S. DISTRICT COURT JUDGE

PROOF OF SERVICE

STATE OF CALIFORNIA)
)ss.:
COUNTY OF LOS ANGELES)

I am employed in the county of Los Angeles, State of California, I am over the age of 18 and not a party to the within action; my business address is 12400 Wilshire Boulevard, Suite 920, Los Angeles, CA 90025.

On October 17, 2006, using the Northern District of California's Electronic Case Filing System, with the ECF ID registered to Michael D. Braun, I filed and served the document(s) described as:

STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULE FOR FILING AMENDED COMPLAINT AND RESPONSIVE DOCUMENTS

The ECF System is designed to automatically generate an e-mail message to all parties in the case, which constitutes service. According to the ECF/PACER system, for this case, the parties served are as follows:

Lionel Z. Glancy, Esq. info@glancylaw.com

Attorneys for Plaintiff

On October 17, 2006, I served the document(s) described as:

STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULE FOR FILING AMENDED COMPLAINT AND RESPONSIVE DOCUMENTS

by placing a true copy(ies) thereof enclosed in a sealed envelope(s) addressed as follows:

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**Attorneys for Proposed Lead Plaintiff
Movant Adrian G. Mongeli and the Class**

1 Patrick E. Gibbs, Esq.
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3 Menlo Park, CA 94025
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4 Fax: (650) 463-2600

5 **Attorneys for Terayon Communications Systems, Inc.**

6 Zaki Rakib
c/o Terayon Communications Systems, Inc.
7 4988 Great America Parkway
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8 Jerry D. Chase
9 c/o Terayon Communications Systems, Inc.
4988 Great America Parkway
10 Santa Clara, CA 95054

11 Mark A. Richman
c/o Terayon Communications Systems, Inc.
12 4988 Great America Parkway
Santa Clara, CA 95054

13 Edward Lopez
14 c/o Terayon Communications Systems, Inc.
4988 Great America Parkway
15 Santa Clara, CA 95054

16 **Defendants**

17 I served the above document(s) as follows:

18 BY MAIL. I am familiar with the firm's practice of collection and processing
19 correspondence for mailing. Under that practice it would be deposited with U.S. postal service on
that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course
20 of business. I am aware that on motion of the party served, service is presumed invalid if postal
cancellation date or postage meter date is more than one day after date of deposit for mailing in an
21 affidavit.

22 I declare, pursuant to Civil L.R. 23-2, that on the date hereof I served a copy of the above-
listed document(s) on the Securities Class Action Clearinghouse by electronic mail through the
following electronic mail address provided by the Securities Class Action Clearinghouse:

23 **scac@law.stanford.edu**

24 I am employed in the office of a member of the bar of this Court at whose direction the
25 service was made.

1 I declare under penalty of perjury under the laws of the United States that the above is true
2 and correct.

3 Executed on October 17, 2006, at Los Angeles, California 90025.

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5 /S/ LEITZA MOLINAR

6 Leitza Molinar
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